

October 26, 2001

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Sent Via Electronic Mail

Dr. Oscar Hernandez  
US EPA Headquarters  
401 M Street, SW  
East Tower, 104A  
Washington, DC 20460

Re: High Production Volume (HPV) Chemical Challenge Program – Test Plan  
Submission (CAS # 68608-82-2 and 25340-17-4)

Dear Mr. Hernandez:

The American Chemistry Council Ethylbenzene HPV Task Group<sup>1</sup> submits for review and public comment its test plan, as well as related robust summaries, for the Diethylbenzene-Rich Streams category of chemicals under the Environmental Protection Agency's High Production Volume (HPV) Chemical Challenge Program. The Panel understands that there will be a 120-day review period for the test plan and that all comments generated by or provided to EPA will be forwarded to the Panel for consideration.

This test plan for the Diethylbenzene-Rich Streams category addresses two streams that contain a predominance of diethylbenzene isomers (87.6 – 98.8 wt%) and are produced during ethylbenzene manufacture. Samples of the streams will be combined to form a test sample for testing.

Briefly, the test plan for the Diethylbenzene-Rich Streams category includes the following tests:

- o Melting Point
- o Boiling Point
- o Vapor Pressure

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<sup>1</sup> The members of the Diethylbenzene-Rich Streams test category are BP Amoco Chemical Company, Chevron Phillips Chemical Company LP, The Dow Chemical Company, Koch Specialty Chemical Company; a Division of Koch Petroleum Group, and Sterling Chemicals, Inc.

- o Partition Coefficient
- o Water Solubility
- o Photodegradation
- o Stability in Water
- o Fugacity Modeling

In the development of this test plan, the Panel considered carefully and tried to limit how many animals might be required for any tests included in the proposed plan and conditions to which the animals might be exposed. As a result, the Panel believes that the concerns of some non-governmental organizations about animal welfare have been fully considered and that use of animals in this proposed test plan has been minimized.

Thank you in advance for your attention to this matter. In contacting this Panel please address Patricia Messenger at (703) 534-3582.

Sincerely yours,

Courtney M. Price,  
Vice President, CHEMSTAR

CC: C. Auer, EPA  
EB DEB HPV Team